Russell City Energy Company, LLC

717 Texas Avenue Suite 1000 Houston, TX 77002

January 24, 2018

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105-2097 Attn: Title V Reports

Re:

Russell City Energy Company, LLC

Title V CEMS Semi-Annual Monitoring Report

Facility No. B8136

Reporting Period: July 1, 2017 – December 31, 2017

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Compliance Monitoring Report for the Russell City Energy Center (RCEC).

RCEC is currently in compliance with the District CEMS regulations. RCEC maintained compliance with the monitoring requirements listed in the Title V permit for RCEC during this reporting period.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

If you have any questions or require additional information, please contact Lauren Bresnahan, EHS Specialist II, at (510) 731-1407.

Sincerely,

Scott Reynolds

Plant Manager and

Designated Representative/ Responsible Official

Russell City Energy Company, LLC

Facility #: B8136

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Table VII – A **Applicable Limits and Compliance Monitoring Requirements** S-1, S-3 GAS TURBINE

S-2, S-4 HEAT RECOVERY STEAM GENERATOR

Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Сотр	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
NO _κ	BAAQMD 9-3-303	N		125 ppm	BAAQMD 1-520.1	C	СЕМ	х	
NOx	BAAQMD 9-9-301.1.3	Y		9 ppmv @ 15% O2, dry	BAAQMD 9-9-501	C _.	СЕМ	х	
NOx	BAAQMD 9-9- 301.2	N		0.15 lb/MW-hr or 5 ppmv	BAAQMD 9-9-501	C.	CEM	х	
NO _x	SIP 9-9-301.3	Y		9 ppmv @ 15% O ₂ , dry	BAAQMD 9-9-501	C	СЕМ	x	
NO _x	40 CFR 60 Subpart KKKK 60.4320(a) Table 1	Y		15 ppm at 15% O2 or 0.43 lb/MW-hr	40 CFR 60 Subpart KKKK 60.4340(b)(1)	C	СЕМ	X	
NOx		Y		None	40 CFR 75.10	q	CEM	Χ ·	
NO _x	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	СЕМ	х	
NO _x	BAAQMD condition #23763, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	X	
NO _x	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	Ċ	CEM	Х	
NO _x	Federal PSD Permit condition #26117, part 19a	Y		16.5 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	Х	:

Title V CEMS Semi-Annual Monitoring Report

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Future Monitoring Monitoring Compliance Type of Citation of FE Monitoring **Effective** Limit Requirement Frequency Limit Limit Y/N Type Yes (P/C/N) No Date Citation 0.00735 lb/MM BTU, for **BAAQMD** each turbine and HRSG **BAAQMD** condition condition combined, except during C NOx Y CEM X #23763, turbine startup, shutdown, #23763, part 19a or combustor tuning part 26b operation 0.00735 lb/MM BTU, for BAAQMD each turbine and HRSG **BAAQMD** Source test condition combined, except during condition NOx Y P/A at maximum X #23763, turbine startup, shutdown, #23763, load part 19a part 30 or combustor tuning operation 0.00735 lb/MM BTU, for Federal PSD each turbine and HRSG Federal PSD Permit condition Permit condition combined, except during NOx Υ C X CEM #26117, turbine startup, shutdown, #26117, part 19a or combustor tuning part 26b operation 0.00735 lb/MM BTU, for Federal PSD Federal PSD each turbine and HRSG Source test Permit condition combined, except during Permit condition X NOx Y P/A at maximum #26117, turbine startup, shutdown, #26117, load part 19a or combustor tuning part 30 operation 2.0 ppmv, @ 15% O2, dry, BAAQMD for each turbine and HRSG BAAQMD condition condition combined, 1-hr average NOx Y C **CEM** X #23763, except during turbine #23763, part 19b startup, shutdown, or part 26b combustor tuning operation 2.0 ppmv, @ 15% O₂, dry, **BAAQMD** for each turbine and HRSG **BAAQMD** Source test condition combined, I-hr average condition NO_x Y P/A X at maximum #23763, #23763, except during turbine load part 19b startup, shutdown, or part 30 combustor tuning operation

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Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
NOx	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C.	CEM	X	
NO _x	Federal PSD Permit condition #26117, part 19b	Y		2.0 ppmv, @ 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	X	
NO _x	BAAQMD condition #23763, part 20	Y		95 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	₽/Ď	Records,	х	·
NO _x	Federal PSD Permit condition #26117, part 20	Y		95 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
NOx	BAAQMD condition #23763, part 20	Y		40 lb/turbine during shutdown	BAAQMD condition #23763, part 26	P/iD	Records,	х	
NOx	Federal PSD Permit condition #26117, part 20	Y		40 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	x	
NOx	BAAQMD condition #23763, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records,	x	-
NOx	Federal PSD Permit condition #26117, part 20	Y		480 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P//D	Records,	X	

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Type of	Citation of	FE	Future	*****	Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
NOx	BAAQMD condition #23763, part 20	Y		125 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	х	
NOx	Federal PSD Permit condition #26117, part 20	Y		125 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	х	
NO _x	BAAQMD condition #23763, part 22a	Y		1,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	BAAQMD condition #23763, part 26	C	СЕМ	x	
NO _x	Federal PSD Permit condition #26117, part 22a	Y		I,453 lb/day for turbines, HRSGs, and fire pump diesel engine, combined, including turbine startup, shutdown, and combustor tuning	Federal PSD Permit condition #26117, part 26	С	СЕМ	х	
NO _x	BAAQMD condition #23763, part 22b	Y		1225 lb/day for turbines, HRSGs, and fire pump diesel engine, combined during ozone season from June 1 through September 30	BAAQMD condition #23763, part 26	С	СЕМ	х	
NO _x	BAAQMD condition #23763, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26	С	СЕМ	X	
NO _x	Federal PSD Permit condition #26117, part 23a	Y		127 ton/yr for turbines, HRSGs, and fire pump diesel engine, combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 26	C ,	CEM	х	

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Type of	Citation of	FE	Future	11-11	Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
СО	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	CEM	х	
СО	BAAQMD condition #23763, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	х	
СО	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	СЕМ	Х	
СО	Federal PSD Permit condition #26117, part 19c	Y		10 lb/hr, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	X	-
со	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	C	СЕМ	х	
со	BAAQMD condition #23763, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum and minimum load	х	
СО	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	СЕМ	х	

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Type of	Citation of	FE	Future	11	Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
СО	Federal PSD Permit condition #26117, part 19c	Y		0.0045 lb/MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	х	
со	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 26b	С	СЕМ	X	
со	BAAQMD condition #23763, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #13763, part 30	P/A	Source test at maximum and minimum load	x	
СО	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 26b	C	СЕМ	X	
со	Federal PSD Permit condition #26117, part 19d	Y		2.0 ppmv, dry, @ 15% O ₂ , for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, or combustor tuning operation	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum and minimum load	х	
со	BAAQMD condition #23763, part 20	Y		891 lb/turbine during hot start-up	BAAQMD condition #23763, part 26	P/D	Records,	X	
со	Federal PSD Permit condition #26117, part 20	Y		891 lb/turbine during hot start-up	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	х	

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Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	170
СО	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during warm start-up	BAAQMD condition #23763, part 26	P/D	Records, calculations	x	
СО	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during warm start-up	Federal PSD Permit condition #26117, part 26	P/D	Records,	Х	
СО	BAAQMD condition #23763, part 20	Y		100 lb/turbine during shutdown	BAAQMD condition #23763, part 26	: P/D	Records,	X	
со	Federal PSD Permit condition #26117, part 20	Y		100 lb/turbine during shutdown	Federal PSD Permit condition #26117, part 26	P/ D	Records,	х	
СО	BAAQMD condition #23763, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 26	P/D	Records,	x	
со	Federal PSD Permit condition #26117, part 20	Y		2,514 lb/turbine during cold start-up or combustor tuning operation	Federal PSD Permit condition #26117, part 26	P/D	Records, calculations	X	
со	BAAQMD condition #23763, part 22c	Y		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 26b	C	CEM	X	
со	Federal PSD Permit condition #26117, part 22c	Y		7,360 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 26b	C	СЕМ	х	
со	BAAQMD condition #23763, part 23b	Y		330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 26b	¢	CEM	X	·

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Type of	Citation of	FE	Future	I imia	Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
СО	Federal PSD Permit condition #26117, part 23b	Y		330 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 26b	С	СЕМ	Х	
CO ₂		Y		None	40 CFR 75.10	C	fuel flow monitor and CO ₂ calculation	Х	
SO ₂	BAAQMD 9-1- 301	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		х	
SO ₂	BAAQMD 9-1- 302	Y		300 ppm (dry)		N		x	
SO ₂	40 CFR 60 Subpart KKKK 60.443(a)(2)	Y		0.060 lb/MMBtu	40 CFR 60 Subpart KKKK 60.4365(a)	P	Natural gas sulfur content certification	· x	
SO ₂		Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, part 2.3		Fuel measure-ments, calculations	X	
SO ₂	BAAQMD condition #23763, part 19g	Y		6.21 lb/hr, for turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	х	
SO ₂	BAAQMD condition #23763, part 19g	Y		0.00128 lb/MM BTU, for turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	х	
SO ₂	BAAQMD condition #23763, part 22f	Y		292 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 27	P/D	Records,	х	
SO ₂	BAAQMD condition #23763, part 23e	Y		12.2 ton/yr for turbines, HRSGs, and diesel fire pump combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records, calculations	X	

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Type of	Citation of	FE	Future		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
Opacity	BAAQMD 6-1- 301	N		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		X	
Opacity	SIP 6-301	Y		≥ Ringelmann No. 1 for no more than 3 minutes in any hour		N		х	
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		N		х	
FP	SIP 6-310	Y		0.15 grain/dscf		. N		Х	ĺ
FP	BAAQMD 6-1- 310.3	N		0.15 grain/dscf @ 6% O ₂		N		х	
	SIP 6-310.3	Y		0.15 grain/dscf @ 6% O ₂		N		x	
PM ₁₀	BAAQMD condition #23763, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	: P/A :	Source test at maximum load	X	
PM ₁₀	BAAQMD condition #23763, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	x	
PM ₁₀	Federal PSD Permit condition #26117, part 19h	Y		7.5 lb/hr, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	x	ų.
PM ₁₀	Federal PSD Permit condition #26117, part 19h	Y		0.0036 lb/MMBTU, for each turbine and HRSG combined	Federal PSD Permit condition #26117, part 30	P/A	Source test at maximum load	x	
PM ₁₀	BAAQMD condition #23763, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	BAAQMD condition #23763, part 27	P/D	Records,	х	!
PM ₁₀	Federal PSD Permit condition #26117, part 22e	Y		413 lb/day for turbines, HRSGs, and fire pump diesel engine combined	Federal PSD Permit condition #26117, part 27	P/D	Records,	х	

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Type of	Citation of	FE	Future Effective		Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
PM ₁₀	BAAQMD condition #23763, part 23d	Y		71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D	Records, calculations	х	
PM ₁₀	Federal PSD Permit condition #26117, part 23d	Y		71.8 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	Federal PSD Permit condition #26117, part 27	P/D	Records, calculations	х	
РОС	BAAQMD condition #23763, part 19f	Y		2.86 lb/hr (as CH4) for each turbine and HRSG combined except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	х	
POC	BAAQMD condition #23763, part 19f	Y		0.00128 lb/MM BTU (as CH4) for each turbine, and HRSG combined except during turbine startup, shutdown, or combustor tuning operation	BAAQMD condition #23763, part 30	P/A	Source test at maximum load	х	
РОС	BAAQMD condition #23763, part 20	Y		35.3 lb/turbine during hot start-up	BAAQMD condition #23763, part 27	P/D	Records,	X	
POC	BAAQMD condition #23763, part 20	Y		79 lb/turbine during warm start-up	BAAQMD condition #23763, part 27	P/D	Records, calculations	х	
POC	BAAQMD condition #23763, part 20	Y		16 lb/turbine during shutdown	BAAQMD condition #23763, part 27	P/D	Records,	x	
POC	BAAQMD condition #23763, part 20	Y		83 lb/turbine during cold start-up or combustor tuning operation	BAAQMD condition #23763, part 27	P/D	Records, calculations	х	

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Type of	Citation of	FE	Future Effective	1:	Monitoring Requirement	Monitoring	Monitoring	Com	liance
Limit	Limit	Y/N	Date	Limit	Citation	Frequency (P/C/N)	Туре	Yes	No
POC	BAAQMD condition #23763, part 22d	Y		295 lb/day (as CH4) for turbines and HRSGs combined	BAAQMD condition #23763, part 27	P/D	Records, calculations	х	
РОС	BAAQMD condition #23763, part 23c	Y		28.5 ton/yr for turbines, HRSGs, and fire pump diesel engine combined (includes emissions from commissioning period)	BAAQMD condition #23763, part 27	P/D:	Records,	х	
NH3	BAAQMD condition #23763, Part 19e	N		5 ppmv, dry, @ 15% O ₂ , averaged over 3 hrs for each turbine and HRSG combined except during turbine startup or shutdown	BAAQMD condition #23763, part 26c, part 29	C	Ammonia injection rate monitor, calculations, and annual source test	х	
Formal- dehyde	BAAQMD condition #23763, part 25	N		10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records,	х	
Formal- dehyde	BAAQMD condition #23763, part 25	N		10,912 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	
Benzene	BAAQMD condition #23763, part 25	N		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records; calculations	X	
Benzene	BAAQMD condition #23763, part 25	N		226 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 on P-2	Source test	x	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 28	P/D	Records, calculations	X	
Specified PAHs	BAAQMD condition #23763, part 25	N		1.8 lb/yr for turbines and HRSGs combined	BAAQMD condition #23763, part 32	P/every two years on P-1 or P-2	Source test	X	

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Type of	Citation of	FE	Future	V čenita	Monitoring	Monitoring	Monitoring	Comp	liance
Limit	Limit	Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Туре	Yes	No
Heat Input limit	BAAQMD condition #23763, part 13	Y		2,238.6 MM BTU/hour, 3- hr average for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	С	Fuel meter, calculations	X	
Heat Input limit	Federal PSD Permit condition #26117, part 13	Y		2,238.6 MM BTU/hour, 3- hr average for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	С	Fuel meter, calculations	х	
Heat Input Limit	BAAQMD condition #23763, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	BAAQMD condition #23763, part 26a	С	fuel meter,	х	
Heat Input Limit	Federal PSD Permit condition #26117, part 14	Y		53,726 MM BTU/calendar day, for each Turbine and HRSG, total	Federal PSD Permit condition #26117, part 26a	С	fuel meter,	х	
Heat Input Limit	BAAQMD condition #23763, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	BAAQMD condition #23763, part 26a	С	fuel meter,	х	
Heat Input Limit	Federal PSD Permit condition #26117, part 15	Y		35,708,858 MM BTU/year for S-1 & S-3 Turbines and S-2 & S-4 HRSGs combined	Federal PSD Permit condition #26117, part 26a	С	fuel meter, calculations	x	
CO₂E	Federal PSD Permit condition #26117, part 50	Y		242 metric tons per hour for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 15	P/M	Fuel meter, calculations	х	
CO₂E	Federal PSD Permit condition #26117, part 51	Y		5,802 metric tons per day for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	х	
CO₂E	Federal PSD Permit condition #26117, part 52	Y		1,928,182 metric tons per year for gas turbines and HRSGs, combined	Federal PSD Permit condition #26117, part 54	P/M	Fuel meter, calculations	х	

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Future Monitoring Monitoring Compliance Type of FE Monitoring Citation of Frequency **Effective** Limit Requirement Limit Limit Y/N Type Yes Citation No Date (P/C/N) Federal PSD Federal PSD Permit condition 7,730 BTU/KW-hr for each Permit condition Heat Rate Y P/A Source Test X #26117, #26117, Limit gas turbine part 53 part 55

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Table VII – B Applicable Limits and Compliance Monitoring Requirements S-5, COOLING TOWER

Type of	Citation of	FE	Future	l ii	Monitoring	Monitoring	Monitoring	Compliance	
Limit	Limit	Y/N	Effective Date		Requirement Citation	Frequency (P/C/N)	Туре	Y	N
Opacity	BAAQMD 6-1- 303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N		Х	
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		х	
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		N		x	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		х	
Total Dissolved Solids	BAAQMD Condition #23763, part 44	Y		6,200 ppmw (mg/l)	BAAQMD Condition #23763, part 44	P/D	Sample and test cooling tower water	X	
Total Dissolved Solids	Federal PSD Permit Condition #26117, part 44	Y		6,200 ppmw (mg/l)	Federal PSD Permit Condition #26117, part 44	P/D	Sample and test cooling tower water	x	

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Table VII – C Applicable Limits and Compliance Monitoring Requirements S-6, FIRE PUMP DIESEL ENGINE

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement	Monitoring Frequency	Monitoring	Compliance	
					Citation	(P/C/N)	Туре	Y	И
Opacity	BAAQMD 6-1- 303.1	N		≥ Ringelmann No. 2 for no more than 3 minutes in any hour		N	·	X	
Opacity	SIP Regulation 6-303.1	Y		≥ Ringelmann 2.0 for 3 minutes in any hour		N		x	
FP	BAAQMD 6-1- 310	N		0.15 grain/dscf		Ņ		X	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		Ŋ		X	
SO_2	BAAQMD 9-1- 301	Y		Property Line Ground Level Limits: ≤ 0.5 ppm for 3 minutes and ≤ 0.25 ppm for 60 min. and ≤ 0.05 ppm for 24 hours	None	N.	N/A	X	
SO ₂	BAAQMD 9-1- 304	Y		Fuel Sulfur Limit 0.5%	BAAQMD Condition # 20498, Parts 5 and 8	P/E	Vendor Certification	x	
Reliability Related Hours	BAAQMD 9-8- 330	N		50 hours	9-8-502	P/E	Totalizing meter, Record- keeping	x	
Hours for maintenanc e and testing	Title 17, California Code of Regulations section 93115.6(a) (4)	Z		Not operate more than the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition	93115.10(d)	P/E	Totalizing meter. Record- keeping	X	
Reliability- related activities	BAAQMD Condition #23763, part 46	N		50 hours per calendar year	BAAQMD Condition #23763, parts 48, 49	P/E	Totalizing meter, record- keeping	x	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring	l Frequency I	Monitoring	Compliance	
					Requirement Citation		Туре	Y	N
Reliability- related activities	Federal PSD Permit Condition #26117, part 46	N		50 hours per calendar year	Federal PSD Permit Condition #26117, parts 48, 49	P/E	Totalizing meter, record- keeping	X	
CO₂E	Federal PSD Permit Condition #26117, part 56	Y		7.6 metric tons per rolling 12-month period	Federal PSD Permit Condition #26117, part 58	P/E	Totalizing meter, record- keeping	X	

Title V CEMS Semi-Annual Monitoring Report Facility Name: Russell City Energy Company, LLC. Reporting Period: July 1, 2017 to December 31, 2017

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Table VII – D Applicable Limits and Compliance Monitoring Requirements S-7, S-8, S-9, S-10, & S-11 CIRCUIT BREAKERS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
				Link				¥	N
CO₂E _	Federal PSD				Federal PSD				
	Permit			39.3 metric tons per rolling	Permit		Record		i i
	Condition	Y		12- month period from S-7	Condition	P,	keeping,	X	
	#26117,			through S-11, combined	#26117,		calculations		1 1
	part 59		<u> </u>		part 60				